

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHINA EXPORT AND CREDIT  
INSURANCE CORPORATION a/k/a  
SINOSURE, and HEFEI REACHEVER  
IMPORT AND EXPORT LTD.,

*Petitioners,*

- against -

API INTERNATIONAL GROUP, LLC,

*Respondent.*

ECF CASE

No. 7:23-cv-05549

**[PROPOSED] ORDER TO SHOW  
CAUSE IN SUPPORT OF DEFAULT  
JUDGMENT AND DAMAGES**

Upon the annexed declaration of Aimée Scala, dated January 10, 2024 and all the exhibits annexed thereto, as well as the Petition filed in this action on June 28, 2023 and the Certificate of Default filed in this action on September 8, 2023,

And further upon the Proposed Default Judgment attached hereto as **Exhibit A** to this Order, it is

ORDERED that Respondent API International Group, LLC (“Respondent”), show cause before the Honorable Nelson Roman, in Courtroom 218, at the United States District Court for the Southern District of New York, at the Courthouse located at 300 Quarropas Street, White Plains, NY 10601, on \_\_\_\_\_ at \_\_\_\_\_, or as soon thereafter as counsel may be heard, why the Proposed Default Judgment attached as **Exhibit A** should not be entered against Respondent pursuant to FED. R. CIV. P. 55(b)(2) for failure to answer or otherwise move with respect to the Petition and in favor of Petitioners China Export and Credit Insurance Corporation a/k/a Sinosure and Hefei Reachever Import and Export Ltd. (“Petitioners”).

It is further ORDERED that a copy of this Order, together with the supporting papers on which it is based, be served upon Respondent API International Group, LLC on or before

\_\_\_\_\_ via certified mail, return receipt requested, to the Secretary of State as agent for Respondent API International Group, LLC, One Commerce Plaza, 99 Washington Avenue, Albany, NY 12231, and that such service be deemed good and sufficient on Respondent API International Group, LLC and file proof of service thereafter.

Dated: \_\_\_\_\_, 2024  
White Plains, New York

\_\_\_\_\_  
The Honorable Nelson Román  
United States District Judge